

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	C.A. No. 08-021 (GMS) (LPS)
v.)	CONSOLIDATED
)	
COBALT LABORATORIES INC., et al.,)	
)	
Defendants.)	
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FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-022 (GMS) (LPS)
)	
BARR LABORATORIES, INC., et al.,)	
)	
Defendants.)	
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FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-052 (GMS) (LPS)
)	
DR. REDDY'S LABORATORIES, INC., et al.,)	
)	
Defendants.)	
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FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-291 (GMS) (LPS)
)	
ORGENUS PHARMA INC.,)	
)	
Defendant.)	

FOREST LABORATORIES, INC., et al.,)	
)	
Plaintiffs,)	
)	
v.)	C.A. No. 08-336 (GMS) (LPS)
)	
APOTEX INC., et al.,)	
)	
Defendants.)	

STIPULATED JURISDICTIONAL DISCOVERY SCHEDULE

Plaintiffs Forest Laboratories, Inc., Forest Laboratories Holdings Ltd., Merz Pharma GmbH & Co. KGaA, and Merz Pharmaceuticals GmbH (collectively "Plaintiffs") and Defendants Organus Pharma, Inc. ("Organus") hereby stipulate as follows:

1. Plaintiffs may serve on Organus a total of eight (8) interrogatories, and Organus may serve on Plaintiffs a total of two (2) interrogatories, all limited to issues concerning jurisdictional discovery. Such interrogatories must be served on or before July 7, 2008, and responses are due on July 25, 2008. The parties further agree, pursuant to Fed. R. Civ. P. 26(b)(2) and 33(a)(1), that the interrogatories served in connection with jurisdictional discovery are separate and apart from the interrogatories on the merits to which the parties would be entitled during potential fact discovery in this case.

2. Plaintiffs may serve on Organus a total fifteen (15) document requests, limited to issues concerning jurisdictional discovery. Such document requests must be served on or before July 7, 2008, and Organus' responses are due on July 25, 2008.

3. Plaintiffs may serve on Organus a total of ten (10) requests for admission, limited to issues concerning jurisdictional discovery. Such requests for admission must be served on or before July 7, 2008, and Organus' responses are due July 25, 2008.

4. Plaintiffs may serve a deposition notice under Fed. R. Civ. P. 30(b)(6) on Orgenus. Such notice will include particular topics limited to jurisdictional discovery and will be served on or before July 8, 2008. The deposition of the witness that Orgenus has designated to testify on the listed topics shall occur no later than August 15, 2008 in New York, New York, and will be limited to four (4) hours of deposition testimony. The parties have agreed that this time limit may be extended if the presence of an interpreter at the deposition is necessary for translation purposes. The parties have further agreed that such deposition will not occur until at least seven (7) calendar days after Orgenus' document production is complete.

MORRIS, NICHOLS, ARSHT & TUNNELL LLP

/s/ Jack B. Blumenfeld

Jack B. Blumenfeld (# 1014)
 Maryellen Noreika (# 3208)
 1201 N. Market Street
 P.O. Box 1347
 Wilmington, DE 19899
 (302) 658-9200
 jblumenfeld@mnat.com
 mmoreika@mnat.com

Attorneys for Plaintiffs

Of Counsel:

John Desmarais
 Gerald J. Flattmann, Jr.
 Melanie R. Rupert
 KIRKLAND & ELLIS LLP
 Citigroup Center
 153 East 53rd Street
 New York, NY 10022
 (212) 446-4800

POTTER ANDERSON & CORROON LLP

/s/ Richard K. Horwitz

Richard L. Horwitz (# 2246)
 David E. Moore (# 3983)
 Hercules Plaza, 6th Floor
 1313 N. Market Street
 Wilmington, DE 19801
 (302) 984-6000
 rhorwitz@potteranderson.com
 dmoore@potteranderson.com

Attorneys for Orgenus

Of Counsel:

LATHAM & WATKINS LLP
 Kenneth G. Schuler
 Sears Tower, Suite 5800
 233 South Wacker Drive
 Chicago, IL 60606

Terrence J. Connolly
 885 Third Avenue, Suite 1000
 New York, NY 10022

F. Dominic Cerrito
Daniel L. Malone
Eric C. Stops
JONES DAY
222 East 41st Street
New York, NY 10017
(212) 326-3939

SO ORDERED THIS _____ day of July, 2008.

The Honorable Leonard P. Stark
United States Magistrate Judge